

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

BLUE SPIKE, LLC	§	Civil Action No. 6:12-CV-499 MHS
<i>Plaintiff,</i>	§	
	§	LEAD CASE
v.	§	
	§	
TEXAS INSTRUMENTS, INC.	§	
<i>Defendant.</i>	§	

BLUE SPIKE, LLC,	§	Civil Action No. 6:12-CV-568-LED
<i>Plaintiff,</i>	§	
	§	JURY TRIAL DEMANDED
v.	§	
	§	
ZEITERA, LLC, ENSEQUENCE, INC.,	§	
AND RELATED CONTENT	§	
DATABASE, INC. d/b/a WATCHWITH,	§	
<i>Defendant.</i>	§	

**DEFENDANT WATCHWITH INC.'S NOTICE OF
JOINDER AND JOINDER IN ZEITERA, LLC'S MOTION TO TRANSFER
VENUE TO THE UNITED STATES DISTRICT COURT FOR THE NORTHERN
DISTRICT OF CALIFORNIA UNDER 28 U.S.C. § 1404(a)**

Defendant Related Content Database, Inc. d/b/a/ Watchwith, Inc. (“Watchwith”) hereby provides notice that it joins in *Defendant Zeitera, LLC’s Motion to Transfer Venue to the United States District Court for the Northern District of California under 28 U.S.C. §1404 (a)* (Dkt. 1155) (“Motion to Transfer”).

Watchwith is accused in the complaint in the above-referenced action based on Zeitera LLC’s “automatic content recognition systems using fingerprint technologies.” Case No. 12-cv-568, Dkt. 1 at ¶9; *see also* Declaration Of Zane Vella In Support Of Watchwith Inc.’s Joinder to Defendant Zeitera LLC’s Motion To Transfer Venue To The United States District Court For The Northern District Of California Under 28 U.S.C. § 1404(a). Thus, Watchwith adopts by reference the briefing and argument in support of the Motion to Transfer and requests that the Court order Blue Spike, LLC’s claims against Watchwith (Case No. 6:12-cv-568) be transferred to the Northern District of California.

Dated: February 5, 2014

/s/ Eric H. Findlay

By:

Eric H. Findlay (Texas Bar No. 00789886)
FINDLAY CRAFT, P.C.
6760 Old Jacksonville Hwy, Suite 101
Tyler, TX 75703
Telephone: (903) 534-1100
Facsimile: (903) 534-1137
efindlay@findlaycraft.com

I. Neel Chatterjee – *LEAD ATTORNEY*
Gabriel M. Ramsey
ORRICK, HERRINGTON & SUTCLIFFE, LLP
1000 Marsh Road
Menlo Park, CA 94025
Telephone: (650) 614-7400
Facsimile: (650) 614-7401
gramsey@orrick.com
nchatterjee@orrick.com

Alyssa M. Caridis
ORRICK, HERRINGTON & SUTCLIFFE, LLP
777 S. Figueroa St.
Suite 3200
Los Angeles, CA 90017
Telephone: (213) 629-2020
Facsimile: (213) 612-2499
acaridis@orrick.com

Christopher J. Higgins
ORRICK, HERRINGTON & SUTCLIFFE, LLP
Columbia Center
1152 15th Street, N.W.
Washington, DC 20005-1706
Telephone: (202) 339-8400
Facsimile: (202) 339-8500
chiggins@orrick.com

Attorneys for Defendant
RELATED CONTENT DATABASE, INC. d/b/a
WATCHWITH

CERTIFICATE OF CONFERENCE PURSUANT TO LOCAL RULES CV-7(h) and (i)

I hereby certify that Defendants have complied with the meet and confer requirement of Local Rule CV-7(h). On February 5, 2014 counsel for Watchwith, Inc. (Walter W. Lackey, Jr.) met and conferred via telephone with counsel for Blue Spike, Inc. (Christopher Honea) regarding the present motion. Counsel for Blue Spike, Inc. indicated that it opposes this motion and discussions have conclusively ended in an impasse, leaving an open issue for the Court to resolve.

/s/ Walter W. Lackey, Jr.

Walter W. Lackey, Jr.

CERTIFICATE OF SERVICE

The undersigned certifies that on February 5, 2014, the foregoing document was served via electronic mail on all counsel who are deemed to have consented to electronic service.

/s/ Eric H. Findlay

Eric H. Findlay